

8

IN THE UNITED STATES DISTRICT COURT  
FOR THE <sup>EA</sup>WESTERN DISTRICT OF <sup>MICHIGAN</sup>~~WISCONSIN~~

AT  
EN

AT  
EN

E. Nelson et al

Plaintiff,

Case No.: 2:2022 cv 10918

vs.

Service Towing Inc  
et al

Defendant.

MOTION FOR ENTRY OF DEFAULT JUDGMENT

THROWER NELSON  
Plaintiff(s) (name) requests that entry of judgment by default be entered against  
Fouts, Scott, Cummins, Granam, City of Warren  
defendant(s) (name) pursuant to Federal Rule of Civil Procedure 55(b). In support of this  
request plaintiff(s) relies (rely) upon the record in this case and the affidavit submitted herein.

Dated this 18 day of August, 2009. 2022 AT  
EN

[Signature]  
Attorney for Plaintiff  
[Signature]

FILED USDC - CLRK DET  
2022 AUG 18 PM4:35

IN THE UNITED STATES DISTRICT COURT  
FOR THE <sup>EA</sup>WESTERN DISTRICT OF <sup>MICHIGAN</sup>~~WISCONSIN~~

AT  
EN

AT  
EN

E Nelson et al

Plaintiff,

Case No.: 2:2022cv10918

vs.

Service Towing Inc et al

Defendant.

AFFIDAVIT IN SUPPORT OF  
MOTION FOR ENTRY OF DEFAULT

THROWER, Nelson  
I, (name), being duly sworn, state as follows:

1. <sup>PRO SE</sup> I ~~am~~ the attorney for the plaintiff in the above-entitled action and I am familiar with the file, records and pleadings in this matter.

2. The summons and complaint were filed on (date). 7-28-22

3. Defendant(s) was (were) served with a copy of the summons and complaint on 7-28-22 (date), as reflected on the docket sheet by the proof of service filed on (date). 7-28-22

4. An answer to the complaint was due on (date). <sup>PER Judge</sup> 8-18-22

5. Defendant(s) has (have) failed to appear, plead or otherwise defend within the time allowed and, therefore, is (are) now in default.

THROWER, Nelson  
6. Plaintiff requests that the clerk of court enter default against the defendant(s).

I declare under PENALTY  
of PERJURY  
Sworn to and subscribed before

me this 18 day of Aug,

2009 2022

that foregoing is  
Notary Public

true and correct  
My Commission Expires: \_\_\_\_\_

Attorney for Plaintiff  
E Nelson

IN THE UNITED STATES DISTRICT COURT  
FOR THE ~~WESTERN~~ DISTRICT OF ~~WISCONSIN~~ <sup>MICHIGAN</sup>

EA  
AT  
EN

AT  
EN

*E Nelson et al*

Plaintiff,

Case No.: *2:2022 cv 10918*

vs.

*Service Towing Inc et al*

Defendant.

AFFIDAVIT IN SUPPORT OF  
MOTION FOR ENTRY OF DEFAULT JUDGMENT

*Nelson, THROVER*  
I, ~~(name)~~, being duly sworn, state as follows:

1. I am the <sup>*Pro se*</sup> ~~attorney~~ for the plaintiff in the above-entitled action and I am familiar with the file, records and pleadings in this matter.

2. The summons and complaint were served upon the defendant(s) on (date). *7-28-22*

3. An answer to the complaint was due on (date). *8-18-22* No response was served within the time allowed by law nor has (have) the defendant(s) sought additional time within which to respond, *as ordered by Judge*

4. The default of defendant(s) was entered on (date). *8-18-22*

5. As required by the Servicemembers Civil Relief Act of 2003, I have confirmed that the <sup>*ALL*</sup> defendant(s) is (are) not currently in active military service.

6. To my best information and belief, defendant(s) is (are) not an infant or incompetent person. <sup>*ALL*</sup>

7. The claim of the plaintiff(s) is for: *\$50 Million USD* (Describe in detail the relief sought. If the

IN THE UNITED STATES DISTRICT COURT  
FOR THE ~~WESTERN DISTRICT OF WISCONSIN~~ <sup>MICHIGAN</sup>

EA  
AT  
EN

AT  
EN

Nelson et al  
Plaintiff,

Case No.: 2:2022cv10918

vs.

Service Towing Inc et al  
Defendant.

CERTIFICATE OF SERVICE

TIPONER  
I, (name), hereby certify that I am employed by (name) and am of such age and discretion as to be competent to serve papers.

I further certify that on this date I caused a copy of the Motion for Entry of Default, Affidavit in Support of Motion for Entry of Default and proposed Entry of Default to be placed in a postage-paid envelope addressed to the defendant(s), at the address(es) stated below, which is (are) the last known address(es) of said defendant(s), and deposited said envelope(s) in the United States mail.

Addressee: Name(s) and address(es) of defendant(s).

4% Atty BARRY MOORMAN  
Mark STRAETMANS, Selina 255 E BROWN St LLC  
#220 320 Birmingham MI 48009  
Dated this 18 day of Aug, 2022

[Signature]  
Elmhor

IN THE UNITED STATES DISTRICT COURT  
FOR THE <sup>EA</sup>~~WESTERN~~ DISTRICT OF <sup>MICHIGAN</sup>~~WISCONSIN~~

E Nelson et al

Plaintiff,

Case No.: 2:2022cv10918

vs.

Service Towing Inc  
et al  
Defendant.

CERTIFICATE OF SERVICE

THROWER, Nelson  
I, (name), hereby certify that I am employed by (name) and am of such age and discretion  
as to be competent to serve papers.

I further certify that on this date I caused a copy of the Motion for Entry of Default  
Judgment, Affidavit in Support of Motion for Entry of Default Judgment and proposed Default  
Judgment to be placed in a postage-paid envelope addressed to the defendant(s), at the  
address(es) stated below, which is (are) the last known address(es) of said defendant(s), and  
deposited said envelope(s) in the United States mail.

Addressee: Name(s) and address(es) of defendant(s).

Birmingham, MI 48009

Attney STRAETMANS,  
SELINA 255 E BROWN  
St # 320

Dated this 18 day of Aug, ~~2000~~ <sup>2022</sup>

[Signature]  
Elyse Nelson

dollar amount is for a sum certain, the clerk of court may enter the default judgment. If the dollar amount is not a sum certain and/or additional relief is sought, such as an injunction, a hearing will be set.)

PER 28 USC §1746 I  
declare under penalty  
of PERJURY

  
\_\_\_\_\_  
Attorney for Plaintiff

Sworn to and subscribed before  
me this 18 day of August,  
~~2009: 2020~~ 2022

foregoing is true and correct  
Notary Public

My Commission Expires: \_\_\_\_\_

IN THE UNITED STATES DISTRICT COURT  
FOR THE <sup>EA</sup>WESTERN DISTRICT OF <sup>MICHIGAN</sup>~~WISCONSIN~~

*AT*  
*EN*

*AT*  
*EN*

*Nelson et al*  
Plaintiff,

Case No.: *2:2022cv10918*

vs.

*Sevice Towing Inc*  
*et al*  
Defendant.

DEFAULT JUDGMENT

*Fouts, Scott, Cummins, City of Warren, GHANAM*

The defendant(s), (name), having failed to appear, plead or otherwise defend in this  
action, and default having been entered on (date), *8-18-22* and counsel for plaintiff(s) having  
requested judgment against the defaulted defendant(s) and having filed a proper motion and  
affidavit (declaration) in accordance with Federal Rule of Civil Procedure 55 (a) and (b);

Judgment is hereby entered in favor of plaintiff(s) *Elizabeth Nelson, Albert Thrope* (name) and against defendant(s)  
*Fouts, Scott, Cummins, GHANAM, City of Warren* (name), as follows: (describe dollar amounts and relief sought in detail)

*Mayor James Fouts*  
*Robert Scott*  
*City of Warren*  
*James Cummins*  
*Gus Ghanam*

*\$50 Million USD*  
*Jointly +*  
*Severally*

Plus interest on the judgment at the legal rate until the judgment is satisfied.

\_\_\_\_\_  
Clerk of Court (if sum certain)  
District Judge (in all other instances)

IN THE UNITED STATES DISTRICT COURT  
FOR THE <sup>EA</sup> ~~WESTERN~~ DISTRICT OF <sup>MICHIGAN</sup> ~~WISCONSIN~~

(AT)  
(EN)

(AT)  
(EN)

E Nelson et al

Plaintiff,

Case No.: 2:2022cv10918

vs.

Service Towing Inc  
et al

Defendant.

ENTRY OF DEFAULT

Plaintiff(s) (name) requests that the clerk of court enter default against defendant(s) GUS GRANAM, City WARREN, Fouts, Cummins, Robert Scott (name) pursuant to Federal Rule of Civil Procedure 55(a). It appearing from the record that GRANAM, City of WARREN, Mayor Fouts, James Cummins, Robert Scott, defendant(s) has (have) failed to appear, plead or otherwise defend, the default of City WARREN GRANAM, Fouts, Cummins, Robert Scott defendant(s) (name) is hereby entered pursuant to Federal Rule of Civil Procedure 55(a).

Dated this 18 day of Aug, 2009. 2022

(AT)  
(EN)

Peter Oppeneer, Clerk of Court